

COLSF 8.1.1 VI

SPOKANE RIVER PHOSPHORUS TECHNICAL ADVISORY COMMITTEE

Municipal Participants:

*City of Coeur d'Alene
Hayden Regional Sewer District
Liberty Lake Sewer District
City of Post Falls
City of Spokane*

Industrial Participants:

*Inland Empire Paper
Kaiser - Trentwood*

Regulatory Participants:

*U.S. EPA Region 10
Wash. State Dept. of Ecology
Idaho Dept. of Environmental Quality*

February 14, 1994

Mr. Ali Raad
Department of Ecology
Toxic Cleanup Program
PO Box 47600
Olympia, WA 98504-7600

RECEIVED

FEB 22 1994

SUPERFUND BRANCH

Dear Ali:

As part of the cleanup activities taking place at the Colbert landfill, a pump and treat system discharging via the Little Spokane River to Long Lake will be on line this winter. The purpose of the pump and treat system will be to control and remediate contaminated ground water. Treated ground water will be discharged. The treated ground water will contain Phosphorus at levels which can't be determined until discharge of the pump and treat commences.

Two items are clear at this time: 1) The project creates a new point source, potentially significant from the standpoint of Phosphorus point source loading; and 2) All current point sources discharging to Long Lake are subject to the Phosphorus management plan and are members of the Spokane River Phosphorus Technical Advisory Committee. In his January 7, 1994, letter, Michael Kuntz of the Toxic Cleanup Program, refers to "A contingency plan for discharge (i.e. mitigation of Phosphorus loading). The contingency plan would be on the agenda for the public meeting." The public meeting is tentatively scheduled for February 24, 1994. There is no indication in this letter that the Technical Advisory Committee (TAC) will be given the opportunity to give input or make recommendations during this process.

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Mr. Ali Raad
February 14, 1994
Page 2

The Spokane River Phosphorus Technical Advisory Committee believes the Department of Ecology supports the Spokane River Phosphorus management plan. Section 6 of the management plan, entitled "New Point Source Discharges," states:

- a. Under the plan, no new point sources of Phosphorus (other than participants to this plan) to the Spokane River will be permitted, unless an existing discharger agrees to remove an additional amount of Phosphorus sufficient to offset the new source.
- b. The TAC is responsible for reviewing any such agreement and make its recommendation to the appropriate regulatory agency.

In this case, the point source discharger is Spokane County and the regulatory agency is the Washington State Department of Ecology. It is the TAC's position that Spokane County must become a responsible Phosphorus manager and join the TAC and the substantive requirements of the NPDES permit, regarding Phosphorus, must contain the TAC's recommendations. We welcome Spokane County's participation in point and non-point Phosphorous issues.

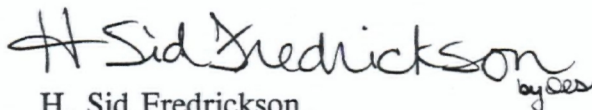
Please submit a proposed contingency plan to Carl Nuechterlein, ERO Water Quality Section, so he may provide them to the TAC for review and recommendations.

Thank you for your cooperation.

Sincerely,



Tim Pelton
Chairman, SRPM TAC



H. Sid Fredrickson
Vice Chairman, SRPM TAC

- c: Timothy L. Nord, Toxic Cleanup Program, Ecology
Neal Thompson, EPA
Dennis Scott, Spokane County